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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

PACIFIC TELECOM INC.)

Petition for Declaratory
Ruling Under Section 310(b)(4)
of the Communications Act of 1934, as
Amended, to Permit Acquisition of
Common Carrier Licenses)

File No. ISP-PDR - _____
AU Docket No. 07-157
WT Docket No. 06-150
PS Docket No. 06-229

FILED/ACCEPTED

DEC - 9 2007

Federal Communications Commission
Office of the Secretary

**PETITION OF PACIFIC TELECOM INC.
FOR DECLARATORY RULING UNDER SECTION 310(b)(4) OF
THE COMMUNICATIONS ACT OF 1934, AS AMENDED**

Pacific Telecom Inc. ("Pacific Telecom" or "PTI") hereby requests a declaratory ruling that the potential acquisition by its wholly-owned subsidiary PTI Pacifica, Inc. ("PTI Pacifica") of wireless licenses that are subject to FCC Auctions 73 and 76 for the 700 MHz band is consistent with the public interest standard under Section 310(b)(4) of the Communications Act of 1934, as amended (the Act").

Proposed auction participant PTI Pacifica is a corporation domiciled in the Commonwealth of the Northern Mariana Islands ("CNMI"). PTI Pacifica is a wholly-owned subsidiary of another CNMI corporation, The Micronesian Telecommunications Corporation ("MTC"), which in turn is wholly-owned by CNMI corporation PTI. PTI is majority-owned (75%) by Prospector Investments Limited ("Prospector"), a company organized under the laws of the Cayman Islands, British West Indies. Prospector is owned by two related individuals: (1) Ricardo C. Delgado, a citizen of the Philippines,

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Because PTI's ownership is essentially the same as when the FCC issued the 2006 *PCS Order* (the only difference from the 2006 *PCS Order* is that Sumitomo Corporation reduced its direct equity interest in PTI from 25% to 20% by assigning a 5% interest to its wholly-owned U.S.-incorporated subsidiary Sumitomo Corporation of America), PTI submits that no new foreign ownership issues are raised by PTI Pacifica's participation in the 700 MHz auction and that the FCC should extend its previous Section 310(b)(4) findings to any 700 MHz licenses, in any geographic location, in the event PTI Pacifica wins at the auction.

Respectfully submitted,

PACIFIC TELECOM INC.



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